

Message

**From:** Hamilton, Scott [hamilton.scott@epa.gov]  
**Sent:** 4/25/2017 12:30:14 PM  
**To:** Compher, Michael [compher.michael@epa.gov]  
**CC:** Qazzaz, Bilal [qazzaz.bilal@epa.gov]  
**Subject:** FW: URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues  
**Attachments:** Region5\_ Ozone \_Data\_Invalidations\_2013-2016.xlsx

Contact is Nathan Kilger [airquality@badriver.nsn.gov](mailto:airquality@badriver.nsn.gov)

MESSAGE TO BAD RIVER...

Hi Nathan. Please see the message below concerning invalidation of ozone data. We spoke with WDNR yesterday and I wanted to reach out to you individually. Bad River only has one failed QC check. WDNR researched the issue and determined that the QC check itself was flawed and should be deleted from AQS. The routine O3 data will remain in AQS.

If you have additional questions or would like to discuss this please feel free to contact me or WDNR.

Monitor ID	Site	Region	State	Check Date	Test Level	Test Concentration	Absolute Difference	Percent Difference
5500300101	BAD RIVER TRIBAL SCH	5	Wisconsin	2015-04-01	75	87	12	16

Monitor ID	Site Name	Region	State	Begin Date	End Date	Number of concentration	Phase	Proposed Action for Affected Data	Rationale
5500300101	BAD RIVER TRIBAL	5	Wisconsin	2015-03-20	2015-04-15	644	2	Delete the check from AQS; keep the data	Data certification notes from 2015 show that the check procedure was determined to be flawed and that surrounding passing nightly and biweekly checks indicate that the instrument was in good working order  No adjustment to the analyzer was made as a result for this check.

Scott Hamilton  
Air Monitoring and Analysis Section  
Air and Radiation Division  
U.S. Environmental Protection Agency  
Phone: 312-353-4775

**From:** Compher, Michael  
**Sent:** Tuesday, April 18, 2017 5:00 PM  
**To:** kilmers@michigan.gov; 'Strassman, Rick (MPCA)' <rick.strassman@state.mn.us>; 'Bloomberg, David E.' <David.Bloomberg@Illinois.gov>; 'Zeiler, Dick' <DZEILER@idem.IN.gov>; paul.koval@epa.ohio.gov; Fenlon, Dennis (MPCA) <dennis.fenlon@state.mn.us>; Jason Treutel <Jason.Treutel@wisconsin.gov>; Katie Praedel <Katie.Praedel@wisconsin.gov>; Robinson, Amy (DEQ) <ROBINSONA1@michigan.gov>; WICKER, JOHN <JWICKER@idem.IN.gov>; Michael.Rigglesman@epa.ohio.gov; Cashman, John <John.Cashman@Illinois.gov>  
**Cc:** Qazzaz, Bilal <qazzaz.bilal@epa.gov>; Hamilton, Scott <hamilton.scott@epa.gov>; McGrath, Jesse <mcmgrath.jesse@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>  
**Subject:** URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues

All (State monitoring and QA Managers) ,

As a result of the Office of Inspector General (OIG) Management Alert issued February 6, 2017, EPA has initiated several corrective actions. One of the follow up actions is to assess the suitability of ozone data for regulatory decisions. In doing this, OAQPS identified all instances of 1-point QC checks (2013 to 2016) for ozone that are outside the critical criteria in the QA Handbook and/or limits contained in approved QAPPs. They have also identified the routine ambient data surrounding the 1-point QC checks that should be null coded in AQS so that the underlying design values supporting the designations process are based on valid data.

OAQPS has requested that EPA regional offices work with affected monitoring organizations to remove any routine data (and its associated 1-point QC check) that does not meet the acceptance criteria in their EPA-approved QAPP and for which no compelling reason or evidence exists to consider the data valid. For this review, I want to clarify that a default decision to invalidate data when critical criteria fail is not the expectation. We want you to consider the compelling reasons/evidence and we want to review that information to ensure that the decisions are appropriate and consistently applied.

OAQPS divided the list into two phases. Phase 1 (sites in IN, OH, MI and MN) includes high priority monitors whose 2014-2016 design value would change or become incomplete due to the data invalidations. These need to be addressed in AQS by May 1<sup>st</sup>. Phase 2 (all R5 states) includes the remaining monitors that will have similar data invalidation actions are coded as Phase 1 in the Excel table, but have a less immediate impact on designations. Phase II needs to be addressed by August 1<sup>st</sup>, 2017.

The most pressing issue at hand is to review the Phase I data identified in the attached spreadsheet, and ensure that routine ozone data and the associated 1-point QC check for *Phase 1 monitors* (Column H—see attachment) are properly validated and reported in AQS. Below, we have outlined the next steps to be taken:

1. Region 5 will schedule a call for Thursday, April 20, 2017 with all of you to provide further detail, and to answer any questions.
2. Please review the attachment "Region5\_Ozone\_Data\_Invalidations\_2013-2016". Each agency needs to identify whether they intend to keep or remove each block of data identified by OAQPS, and provide a rationale for either decision. To track and document this, we suggest populating the two columns labelled "Proposed Action for Affected Data" (e.g. invalidate) and "Rationale" in the "Data Invalidations" worksheet of the attached xls file. **At this time, give priority to monitors identified as 'Phase 1'.**
3. Region 5 will schedule one-on-one calls starting Monday, April 24, 2017 with States to discuss the monitors identified in Phase 1, and your proposed action and rationale provided in the xls file. We will follow up at a later date to discuss monitors identified as Phase 2.
4. After our discussions with each State and by May 1<sup>st</sup>, we need you to reflect the outcomes of your assessment and our discussions in AQS for the Phase 1 monitors.

As our Regional QA Coordinator for Air Monitoring, Bilal Qazzaz will be our primary R5 contact. We will continue to coordinate with those included in this message (State Monitoring and QA Managers), unless we receive a reply that someone else in your organization should be the primary contact. This has a very short turn-around and could take considerable time depending on how many monitors are on your State's list. We appreciate your attention and responsiveness.

Michael Compher  
Chief, Air Monitoring and Analysis Section  
Region 5 Air and Radiation Division  
U.S. Environmental Protection Agency

Phone: 312-886-5745